



June 25, 1998

VIA FEDERAL EXPRESS

Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M Street N.W., Room 222  
Washington, DC 20554

RECEIVED

JUN 25 1998

FCC MAIL ROOM

Dear Ms. Salas:

**Re: CCD No. 92-237; In the Matter of the North American Numbering Plan,  
Carrier Identification Codes (CICs)**

Enclosed for filing in the above captioned matter are an original and four (4) copies of a Petition of Coon Valley Telephone Company for Extension of Time Granted in Prior Waiver. We trust that the enclosed will be found in order for filing and grant. We have also enclosed one copy to be stamped and returned in the enclosed self-addressed stamped envelope.

Should you require any further information, or have any questions regarding this filing, please call me at (719) 594-5828.

Sincerely,

A handwritten signature in cursive script that reads "Leslie Christina Pilgrim".

Leslie Christina Pilgrim  
Consultant

Enclosures

cc: Service List

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Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of )

Administration of the )

North American Numbering Plan, )

Carrier Identification Codes (CICs) )

CC Docket No. 92-237

**PETITION OF COON VALLEY TELEPHONE COMPANY  
FOR EXTENSION OF TIME GRANTED IN PRIOR WAIVER**

**I. Introduction**

Coon Valley Telephone Company, (hereafter "Coon Valley"), by its consultant, and pursuant to the Order on Reconsideration, Order on Application for Review, and Second Further Notice of Proposed Rulemaking, CC Docket No. 92-237, (hereafter "the Order"), hereby requests an extension of its temporary waiver of the requirement that all Local Exchange Carriers ("LECs") that are equal access complete upgrades to their switches to recognize four digit CICs by January 1, 1998.

In the Order, the FCC reaffirmed its requirement that LECs that provide equal access must convert their switches to accept four digit CICs by January 1, 1998. The FCC also extended the permissive period to June 30, 1998 during which three and four digit CICs would continue to be accepted.

In compliance with paragraph 24 of the FCC's Order on Reconsideration, Coon Valley sought relief of the FCC's conversion deadline of January 1, 1998, and was

granted a waiver until June 30, 1998.<sup>1</sup> Due to cost considerations, Coon Valley will not be able to comply with the June 30, 1998 deadline. Coon Valley will identify these special circumstances that warrant a deviation from the Order and show that an extension of the waiver will serve the public interest. Also, Coon Valley will show good cause that a waiver of the Commission's Order is necessary and appropriate as well as in the public interest.

## **II. Background**

Coon Valley Telephone Company serves two exchanges, one of which (Menlo) will not be capable of meeting the 4-digit CIC requirement. The Menlo exchange serves approximately 454 access lines, five payphones and no hotel/motel lines. The exchange is currently served by a Stromberg/Carlson with the generic software version 14.1. The switch was installed in 1987.

Coon Valley became aware of the requirement to upgrade or change its current software generic to accommodate four-digit CIC and seven-digit CAC shortly after the FCC released its April, 1997 Order. Coon Valley had planned to upgrade the 14.1 software to a 21 software generic in the third quarter of 1998. In its previous waiver request, Coon Valley stated its intent was to expedite the installation of the upgrade at a

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<sup>1</sup> *Petitions for Waiver of the Four-Digit Carrier Identification Code (CIC) Implementation Schedule*, NSD File Nos. 97-74; 97-63; 97-78; 97-75; 97-66; 97-67; 97-65; 97-68; 97-73; 97-70 ;97-72; 97-76; 97-64; 97-71; 97-69, Order, DA 97-2691, rel. December 24, 1997.

cost of \$235,000 and would make every effort to meet the June 30, 1998 permissive period deadline.

### **III. A Waiver of the Commission Rules is Necessary and in the Public Interest**

In order to comply with the FCC's order, Coon Valley requires, at minimum, an upgrade to the switch to the latest generic software level. The current software generic cannot accommodate these requirements due to the translations field that contains the CIC/CAC codes not being long enough to accept four digit codes. In order to accommodate the four digit CIC and seven digit CAC, the translation fields require an expansion. The expansion of the fields is reliant upon the vendor(s) to rewrite the generic software and ultimately the LEC to install a new generic software release or buy a new switch with the more current software generic. Coon Valley's switch with the current software generic was installed prior to the industry addressing the expansion from a three-digit CIC to a four-digit CIC. In order to comply with the CIC/CAC requirements, it is an operational necessity for Coon Valley to either replace the switch or upgrade the software generic.

Since its original request for waiver, Coon Valley has re-evaluated the costs to upgrade the existing system. Specifically, Coon Valley investigated a switch replacement versus an software generic upgrade. From this investigation Coon Valley concluded it would be more beneficial to replace the switch entirely rather than to install a more costly upgrade. Three different vendors were provided specifications for a new switch and requested to provide pricing. Based on the information from the vendors, Mitel was

awarded the bid to replace the current switch. The decision to install a new switch was based primarily on the expected cost savings between upgrading the software generic and installing a new switch, regulatory requirements and customer needs. The savings was estimated to be \$40,000, as shown in Attachment 1.

The current implementation schedule calls for the Menlo installation to be completed on October 29, 1998, as shown in Attachment 2.

Coon Valley believes that by granting this waiver the impact to its customers will be minimal. Coon Valley is making a concerted effort to comply with all of the FCC requirements and meet its customer needs in a cost effective manner. It is taking the necessary steps to ensure that the regulatory requirements and customer needs will be met. The implementation of a new switch versus a switch upgrade allows the company greater flexibility to meet the current and future regulatory requirements. Coon Valley submits that grant of this petition will serve in the best interest of the public. Based on the aforementioned information Coon Valley requests that an extension be granted until October 30, 1998.

### **Conclusion**

Coon Valley is actively pursuing a remedy to meet the FCC's requirement in a cost effective manner. Grant of this petition for extension will serve the public interest and will allow Coon Valley to complete its switch replacement and meet the FCC's CIC/CAC requirements. Coon Valley submits that the public interest will be better served by an extension of the waiver and that grant of this petition would be consistent

with the policies underlying these rules. Good cause having been shown, Coon Valley Telephone Company respectfully requests the Commission grant the petition.

Leslie Christina Pilgrim  
Leslie Christina Pilgrim  
Consultant, GVNW Inc./Management

June 25, 1998  
Date

## **SERVICE LIST**

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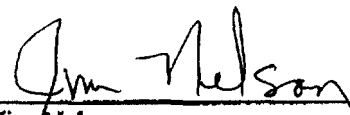
AFFIDAVIT

STATE OF IOWA )

COUNTY OF GUTHRIE )

Jim Nelson, Manager of Coon Valley Telephone Company, first being duly sworn, on his oath states:

1. that he has participated in the preparation of the foregoing petition,
2. that he attests to the reasons stated therein and as discussed with vendors and his engineering consultant, deem it an operational necessity to replace the current switch or to upgrade the software generic,
3. that for reasons stated therein deem it cost effective and in the public's best interest to replace the switch in order to comply with the FCC's mandate,
4. and that the information contained therein are true to the best of his knowledge and belief.

  
Jim Nelson

Subscribed and sworn to before me this 24 day of

 1998.

  
Notary Public

My commission expires

